

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**BOND PHARMACY, INC., d/b/a AIS  
HEALTHCARE,**

**Plaintiff/Counterclaim- Defendant,**

**v.**

**ANTHEM HEALTH PLANS OF VIRGINIA,  
INC., d/b/a ANTHEM BLUE CROSS AND  
BLUE SHIELD,**

**Defendant/Counterclaimant-Plaintiff.**

**Civil Action No. 1:22-cv-01343-CMH-IDD**

**MOTION TO QUASH SUBPOENAS**

Defendants respectfully move the Court, pursuant to Federal Rule of Civil Procedure 45, for an order quashing two subpoenas issued by Plaintiffs. The grounds for this motion are more fully set forth in the accompanying Memorandum of Law.

Defendants move that these subpoenas be quashed because the requested witnesses are beyond the Court's subpoena power, currently residing and working in Ohio and Kentucky, respectively, and both beyond 100 miles from the Court and outside the state of Virginia. The subpoenaed witnesses are not parties nor officers of a party.

WHEREFORE, for the foregoing reasons, Defendant respectfully requests that this Court enter an order quashing these subpoenas.

Dated: February 6, 2024

Respectfully submitted,

By: /s/ Michael E. Lacy  
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*Counsel for Defendant*

**Certificate of Service**

I certify that I have on this 6th day of February, 2024, filed the foregoing Motion to Quash Subpoenas using the Court's ECF system which will give electronic notification to all parties of record.

/s/ Michael E. Lacy  
Michael E. Lacy